

1 The Honorable Ricardo S. Martinez
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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 ALDERWOOD SURGICAL CENTER, LLC,
13 a Washington limited liability company;
14 NORTHWEST NASAL SINUS CENTER,
P.S., a Washington professional service
corporation, and JAVAD A. SAJAN, M.D.,

15 Defendants.

16 NO. 2:22-cv-01835-RSM
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STIPULATED MOTION AND
ORDER EXTENDING DISCOVERY
CUTOFF AND DISPOSITIVE
MOTION DEADLINE

NOTE ON MOTION CALENDAR:
May 14, 2024

Pursuant to LCR 7(d)(1), the undersigned parties respectfully request that the Court approve a revision to the Case Scheduling Order (Dkt. #76) as revised by the Court's April 19, 2024 Order Granting in Part Perkins Coie's Telephonic Motion to Withdraw (Dkt. #117). The current discovery cutoff is set for May 27, 2024. Dkt. #117 at 7. The current deadline for dispositive motions is June 11, 2024. Dkt. #76. By this stipulation and proposed order, the parties hereby request that the discovery cutoff be moved to June 10, 2024 and the dispositive motion deadline be moved to June 18, 2024. Pursuant to LCR 16(b), any motions to exclude expert testimony (*Daubert* motions) shall also be filed no later than June 18, 2024. The parties request no further changes to the case schedule.

The Court is aware of the procedural history of this case as summarized in its April 19, 2024

1 Order. Dkt. #117 at 1-2. Subsequent to that Order, on May 8, 2024, undersigned counsel for
2 Defendants made their appearances and Perkins Coie withdrew. Upon appearing, undersigned
3 defense counsel requested further delay of three key scheduled depositions. Plaintiff agreed to a
4 short delay, but even that short delay requires the extension of the discovery and dispositive motion
5 deadlines. By moving these two deadlines the parties intend to keep the remaining case schedule
6 intact, including the September 9, 2024 trial date.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 14th day of May, 2024.

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Attorney General

s/ Bret Finkelstein

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I certify that this memorandum contains 229 words, in compliance with the Local Civil Rules.

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Sinus Center P.S., and Javad A. Sajan,
M.D.*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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DATED this 15th day of May, 2024.

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7 RICARDO S. MARTINEZ
8 UNITED STATES DISTRICT JUDGE
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